

FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CARMEN CARTER

Case No.: C-1-00-977

Plaintiff

Senior Judge Herman Weber

vs

THE E. W. SCRIPPS COMPANY

Defendant

AFFIDAVIT OF CARMEN CARTER

I, Carmen Carter, being first duly sworn, depose and say that I am the Plaintiff in the above-entitled case, that in support of my application for appointment of counsel, I state that because of my indigence I am unable to afford an attorney; that I believe I am entitled to redress; and that the issues I wish to present are the following:

- (1) All Orders the Court granted the Defendant because the Plaintiff was incapable of responding are based on deliberately false or misleading information from the Defendant.
- (2) Vacatur of above mentioned Court Orders pursuant to Federal Rules of Civil Procedure 60(b)(1) and 60(b)(3).
- (3) The Defendant not only has a pattern of discriminatory and disparate practices Towards female and/or African-American employees – management indulging in such conduct is promoted.
- (4) The Plaintiff experienced disparate discipline in the employ of the Defendant.
- (5) The E. W. Scripps Company violated federal employment discrimination laws.
- (6) The Defendant elicited a paper trail campaign to terminate the Plaintiff's employment.

I further swear that the statements made below relative to due diligence in searching for an attorney are true:

- (1) Reisenfeld & Associates required a \$20,000 retainer.

- (2) Sharon Zealey of Blank Rome LLP, explained I couldn't afford them (quoted a \$400/hour tab) and referred me to William Bell, as well as Gonzalez, Saggio & Harlan LLP.
- (3) William D. Bell Sr. required a \$12,000 retainer to handle this and the twin case C-1-00-739.
- (4) Robin Jarvis required a retainer of \$7,000-\$8,000.
- (5) Megan Clark of Freking & Betz was prepared to contract to examine documents in the case for \$1,000, plus expenses (maintaining a credit balance equal to the retainer). As I was unable to raise the initial \$1,000, there was no discussion of Freking & Betz taking the cases.
- (6) David Stenson of Dayton, OH, required a \$1,500 retainer.
- (7) Mezibov & Jenkins required a \$2,000 retainer.
- (8) As a one-time member of Pre-Paid Legal Services, Inc. of Ada, Oklahoma, the Plaintiff was quoted a \$5,000 retainer to initiate litigation, since their service is purportedly to shield members from litigation.
- (9) Ulmer & Berne; Laufman & Gehardstein; and Gonzalez Saggio & Harlan LLP all had conflicts of interest.

I also duly swear, depose and say as follows:

I am a beneficiary of Social Security Disability at \$1,500 per month.

I own a 1990 Mercury Topaz.

I also duly swear, depose and say as follows:

The Defendant provided no personnel files, disciplinary documents, salary data and other requested discovery documents.

I also duly swear, depose and say as follows:

The two-page document from Central Community Health Board is an official part of my medical record and my Social Security Administration record.

The admission form with my name, address, employment and symptoms; and the redacted hand written page with the wrong surname but correct birth date, indicating symptoms of Major Depressive Disorder are authentic documents from my University of Cincinnati Hospital medical record.

FURTHER, AFFIANT SAYETH NOT,

Carmen Carter

Carmen Carter

Sworn to and subscribed before me this 17th day of August 2004.

Barbara M. Miller
Notary Public

Notary Public